

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

WILLIAM THOMAS SPENCER

Criminal No.

(21 U.S.C. §§ 841(a)(1)

and 841(b)(1)(C); 18 U.S.C.

§ 924(c)(1)(A)(i))

[UNDER SEAL]

17-92

**INDICTMENT**

**COUNT ONE**

The grand jury charges:

On or about February 11, 2017, in the Western District of Pennsylvania, the defendant, WILLIAM THOMAS SPENCER, did knowingly, intentionally and unlawfully possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base, in the form commonly known as crack, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**FILED**

MAR 28 2017

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WEST. DIST. OF PENNSYLVANIA

**COUNT TWO**

The grand jury further charges:

On or about February 11, 2017, in the Western District of Pennsylvania, the defendant, WILLIAM THOMAS SPENCER, did knowingly, intentionally and unlawfully possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT THREE**

The grand jury further charges:

On or about February 11, 2017, in the Western District of Pennsylvania, the defendant, WILLIAM THOMAS SPENCER, did knowingly and unlawfully possess firearms, that is, a Glock 23 .40 caliber pistol, bearing serial number KZX227, and a Bushmaster AR-15 rifle, bearing serial number BFIT024680, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(a)(1), as charged at Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

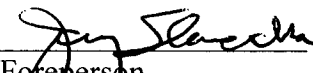
FORFEITURE ALLEGATIONS

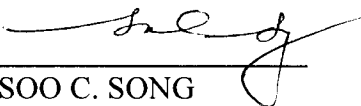
1. The grand jury re-alleges and incorporates by reference the allegations contained in Counts One, Two, and Three of this Indictment for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 924(d); Title 21, United States Code, Sections 853(a)(1), 853(a)(2), and 853(p); and Title 28, United States Code, Section 2461(c).

2. As part of the commission of the violations of Title 18, United States Code, Section 924(c)(1)(A)(i), and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), charged in Counts One through Three of this Indictment, the defendant, WILLIAM THOMAS SPENCER, did use and intend to use the firearms listed in Count Three of this Indictment, a Glock 23 .40 caliber pistol, bearing serial number KZX227, and a Bushmaster AR-15, bearing serial number BFIT024680, in any manner to commit and to facilitate the commission of said violations, thereby subjecting said property to forfeiture pursuant to Title 21, United States Code, Section 853(a)(2), and Title 18, United States Code, Section 924(d).

3. As a result of the commission of the violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), charged in Counts One and Two of this Indictment, the defendant, WILLIAM THOMAS SPENCER, acquired \$1,033.00 in United States currency, which was seized on February 11, 2017, all of which constitutes and is derived from the proceeds obtained, directly and indirectly, from said violations, thereby subjecting said property to forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853(a)(1).

A True Bill,

  
Foreperson

  
SOO C. SONG  
Acting United States Attorney  
DC ID No. 457268